

Laurelhurst Community Club

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March 10, 2009

Shelley Bolser, Land Use Planner
Department of Planning and Development
700 Fifth Avenue, Suite 2000
P.O. Box 34019
Seattle, Washington 98124-4019

RE: Project Number 3008972, University Village, 4500 25th Avenue NE

Dear Ms. Bolser:

The Laurelhurst Community Club Board of Trustees offers the following environmental scoping comments on Project Number 3008972, proposed expansion at U Village. University Village is planning an addition that will expand its shopping center by approximately 26 percent. The proposal calls for three buildings totaling 81,142 square feet of retail and 23,858 square feet of restaurant and new structured parking for 702 vehicles.

Parking garage: The DEIS should study the possibility of reorienting the new parking structure so that higher floors are located to the west and lower floors tier down to the east. In addition, the DEIS should investigate the possibility of reducing the overall height by two stories and/or building the garage partially underground. This would create a better alignment on NE 45th as the viaduct climbs vertically and would reduce the amount of bulk in the overall design for the pedestrian scale. The south elevation is tall, narrow and does not provide a safe and open passage for pedestrians who should be encouraged to walk and use transit at nearby stops. A higher profile to the west will also be more efficient in directing traffic into the denser part of the surrounding community and to 25th Avenue NE, which is not as congested.

Cumulative impacts: The DEIS should study the cumulative impacts of other development in the area, many of which will be coming on line soon. These projects include:

- QFC redevelopment on its University Village site—31,000 square feet of new retail, 350 residential units, structured parking for 700 vehicles and tenant improvements to the existing grocery store;
- The addition of 1.5 million square feet of development of Seattle Children's Hospital and expansion of its major institution boundaries across Sand Point Way to include the Hartmann property;
- Construction of the University Light Rail Station for Sound Transit on Montlake Boulevard;

- A major renovation of the University of Washington's Husky Stadium;
- Replacement of SR 520 and its access ramps;
- Development of the Talaris (Battelle) property in Laurelhurst which calls for 97,600 square feet in Phase 1; and
- Development at Warren G. Magnuson Park, including the new Mountaineers building, the lighted soccer fields and a new tennis center.

All of these development projects are in the pipeline and will create new traffic gridlock, especially at Five Corners (the intersection of NE 45th Street, Mary Gates Way and Union Bay Place NE) as well as the .7 mile distance on Montlake Boulevard from the intersection at 25th Avenue NE and NE 45th Street, the route to SR 520. Both of these intersections are already operating at an unacceptable levels of service and additional traffic from more retail space will cause the level of service to degrade further.

Traffic analyses: Traffic studies and modeling for the University Village expansion should be based upon original data and should not use the updated, limited "piggybacked" information from Transpo that was used to evaluate Seattle Children's Hospital expansion. Gibson Consultants found that the data that Transpo used for traffic modeling underreported the traffic volumes. New, verifiable data is needed in an EIS.

The trip generation data used by Transpo was not based upon the standard Institute of Transportation Engineers (ITE) formula. ITE rates are the industry standard for determining new trip generation data for such sites, rather than the complicated unverifiable modal split calculation that Transpo used for Children's expansion plan. For that project, the modal split trip generation does not appear to have been calibrated using actual count data, thus making it impossible to determine its validity against actual conditions. As a result, the number of trips per day was grossly underestimated. University Village should avoid these problems and use the ITE formula, at least as a starting point with analysis of this and any other method included in the DEIS.

In its initial traffic study, University Village relied upon Transpo's study for Seattle Children's and then decided that this proposed development was speculative and failed to consider the cumulative impacts of this project. The construction impacts of Children's expansion will likely commence in 2009 and the significant impacts cannot be discounted.

U Village initial traffic study: As LCC stated in its September 17, 2008 comments on proposed University Village expansion, there are many flaws in the U Village traffic study that are too numerous to mention. We reiterate a few notable examples that we mentioned in our earlier letter: trip distribution levels in the University Village traffic study are inappropriately based on customer surveys. The study addresses the south and west sides of the property but nowhere does it address the east side where one of the main driveways leads directly to the current parking garage. This unsignalized driveway intersects with Union Bay Place NE near the Burke Gilman Trail crossing and NE 50th Street. This collector arterial is already highly

impacted by University Village traffic and any increase in traffic would increase the danger level on the Burke Gilman Trail crossing. Regarding peak volumes and studies relied upon by University Village, it should be pointed out that as roadways, such as bridges, reach capacity, congestions means machine counts time out and do not provide an accurate count. The City mentioned this in its 2002 study for the University District stating under future conditions *“It is possible that the existing peak hour traffic counts are low because of the bottlenecks at the bridges and freeway ramps. The actual peak hour demand could be higher if those bottlenecks and backups were free flowing.”* These flaws should be addressed in a revised traffic plan and the DEIS.

Traffic studies for the University Village expansion must include “off peak” times. The shopping center traffic is different than the “PM peak” model that is the standard for predicting traffic volumes and wait times for vehicles. It is vital to the neighborhoods that surround the University Village to be able to circulate around the area on the weekends as well as during traditional peak times. The double impacts of the University of Washington weekend events added to busy shoppers is an entirely different traffic management problem which severely impacts local residents.

In the SR 520 replacement research, the Seattle boating community has documented that the Montlake Bridge can open as much as 90 times on the average weekend day from April through September. Each three-minute bridge opening creates 28-48 minutes of traffic backups along Montlake Boulevard with existing traffic conditions. This information is very significant to consider when analyzing a major shopping center expansion and its related weekend traffic.

Employee parking: Employee parking, especially during off peak times when Metro has a reduced transit schedule, is not adequate to support this additional amount of retail space. If transit service cannot be provided, the DEIS should study scaling back the project to meet the needs of its employees and to avoid the continued overflow employee parking into the neighborhoods. A continuing problem around the perimeter of University Village has been all day street parking from employees onto neighborhood streets. University Village must address this issue. It is not appropriate that local residents cannot find a parking place outside their own homes or that some small businesses around the University Village have closed in part due to lack of available customer parking. All for Kids, the Thai bubble tea / coffee shop and the TableTop Shop have recently closed in part because of lack of customer access due to street parking occupied with cars from University Village employees.

Customer parking: The University Village already has a parking deficiency. The Existing Parking Utilization Study shows that on three days during the lowest usage period of the entire calendar year, its overall parking utilization was already at 80 percent with 96 percent of the desirable surface lot spaces filled. Even the more inconvenient garage was at 56 percent of capacity. That would put them well within the desirable 85-90 percent during the bulk of the rest of the year and with insufficient parking during the holiday seasons. Meanwhile, University Village is asking to increase its building square footage by over 26 percent, but only increase its parking by 14 percent. The only possible outcome of that equation is to have insufficient parking most of the year. The DEIS should study and resolve customer parking issues.

Concurrency: As LCC stated in September 2008, the University Village traffic study incorrectly states that the proposed project would meet the City's transportation concurrency requirements. Concurrency is based on 1998 counts with no adjustment for future growth that is expected in the University district. The University Area Transportation Strategy (UATAC) Future Conditions Summary prepared for the Seattle Department of Transportation (January 2008) and on the Seattle Department of Transportation (SDOT) website identifies growth of traffic volumes during the peak hour increasing by a minimum of 10% and up to 69% on some arterials to the 2030 study year (Page 3 of Future conditions report). The screenline data from attachment T-7 (model forecasting) should be utilized for concurrency evaluation rather than the 1998 data. Or, at least the major projects in the area need to be included in the pipeline as the director's rule only excludes minor projects as being within current adopted count data.

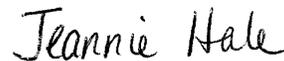
Mitigation: The DEIS should outline an extensive program for mitigation of the impacts of the proposed expansion and infrastructure needs to accommodate the additional growth. Village employees and some shoppers currently park on both sides of NE 50th Street and on the east side of 30th Avenue NE, especially during holiday seasons. This makes navigation of those roadways difficult and dangerous for cars, bikes and pedestrians alike. Any growth of University Village should trigger mitigation on these streets, at minimum, requiring University Village to bring the streets to regulation widths and install sidewalks on both sides.

Thank you for considering the comments of the Laurelhurst Community Club.

Sincerely,



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